IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

CIVIL NO.: 12-cv-02039

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

MOTION REQUESTING BRIEF EXTENSION OF TIME

MAY IT PLEASE THE COURT:

COME NOW, Codefendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau ("PRPB"), through the undersigned attorneys, and very respectfully state and pray:

- 1. On October 8, 2021, the parties filed "Joint Informative Motion in Compliance with Minute Order at Docket 1846". Docket 1860. At paragraph 5 of said motion, PRPB stated that it intended to file a separate motion within twenty (20) days to elaborate on a staffing problem at PRPB which posed compliance challenges in certain areas of the Consent Decree in this case.
- 2. Due to unrelated pressing matters, PRPB has been unable to complete gathering and sorting out the required information. However, a brief period of ten (10) additional days suffices to finalize the review and evaluation process of the information and be in a position to file the motion.

WHEREFORE, Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Bureau, respectfully request this Honorable Court to grant an extension of ten (10) days for the

Case 3:12-cv-02039-FAB Document 1876 Filed 10/29/21 Page 2 of 2

Motion Requesting Extension of Time Civil No. 12-02039

Page 2 of 2

parties to submit the separate motion on staffing at PRPB as stated in the Joint Motion at Docket

1860.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this same date, we electronically filed the foregoing

with the Clerk of the Court using the CM/ECF system which will send notification of such

filing to all counsel of record.

In San Juan, Puerto Rico, this 29th day of October, 2021.

For Defendant COMMONWEALTH OF PUERTO RICO:

CANCIO, NADAL & RIVERA, L.L.C.

P.O. Box 364966 San Juan, Puerto Rico 00936-4966 403 Muñoz Rivera Avenue San Juan, Puerto Rico 00918 Tel. (787) 767-9625

S/ RAFAEL BARRETO-SOLÁ

USDC PR: 211801 rbarreto@cnr.law

S/ GABRIEL A. PEÑAGARÍCANO

USDC PR: 212911

gpenagaricano@me.com